

AO 91 (Rev. 02/09) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

JUN 10 2017

David J. Bradley, Clerk

United States of America  
v.  
Edith Arehli SALINAS (United States Citizen)  
1998

Case No. M-17-1033-M*Defendant*

## CRIMINAL COMPLAINT

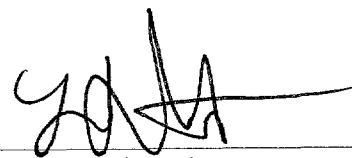
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 06/09/2017 in the county of Hidalgo in the Southern District of  
Texas, the defendant violated Title 21 U. S. C. § 841/952  
, an offense described as follows:

defendant did knowingly and intentionally posses with the intent to distribute and did knowingly and intentionally  
import from the United Mexican states into the United States 10.62 kilograms of cocaine, a scheduled II controlled  
substance

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

*Complainant's signature*

Laurence Diamond, Special Agent HSI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 06/10/20174:04 pm

*Judge's signature*City and state: McAllen, Texas

Peter Ormsby, US Magistrate Judge

*Printed name and title*

## ATTACHMENT "A"

On June 09, 2017 at approximately 2038 hours, at the Hidalgo, Texas Port of Entry (POE), Supervisory Customs and Border Protection Officer (CBPO) Gilberto Martinez received a phone call from an unknown male. The CBP caller I.D function showed the incoming call to come from the number 899-125-7769. The anonymous male caller stated that a Volkswagen Jetta loaded with narcotics, being driven by a female would soon cross into the United States through the POE. CBPO Martinez notified all other CBPO's of the information he received. At approximately 2115 hours, the anonymous caller again contacted the Hidalgo POE and said the vehicle was now about to cross and it was bearing Texas license plate "JPB-8725".

At approximately 2200 hours CBPO Canine Enforcement Officer Eric Clough and his canine "Miso" began conducting pre-primary canine sweeps in an attempt to locate the suspected smuggling vehicle. CBPO Clough located a black Volkswagen Jetta being driven by a single female, later identified as Edith Arehli Salinas (SALINAS), and bearing Texas license plate "JPB-8725". CBPO Clough conducted a free air canine sweep of the vehicle. The canine alerted to the exterior of the vehicle for the possible presence of narcotics. CBPO Clough received a negative declaration from SALINAS for contraband. SALINAS exited the vehicle and CBPO Randy Garcia drove the vehicle to the secondary inspection area.

During the secondary inspection of the Volkswagen Jetta, CBPO Garcia and CBPO Jose G. Canales discovered a compartment under the center console. CBPO Canales gained entry to the compartment and saw several packages wrapped in brown tape. CBPO Canales probed one of the packages and discovered a white powdery substance. CBPO Canales, using "Scott Reagent Test Kit #122" conducted a field test of the white powdery substance and received a positive reaction for the presence of cocaine. CBPO Garcia and CBPO Canales extracted ten packages with a total weight of 10.62 Kilograms.

Homeland Security Investigations (HSI), McAllen, Texas Special Agent Laurence Diamond and HSI Special Agent Raul Garza responded to the Hidalgo, Texas, POE to interview SALINAS. Prior to questioning, SALINAS was read her Miranda Warnings which she waived and voluntarily agreed to speak with SA Diamond and Garza.

During the interview, SALINAS initially said that she travelled to Mexico on this date to purchase the Volkswagen Jetta from an unknown person she found through a craigslist advertisement and she paid \$3,000.00 U.S Dollars. SALINAS then said that was untrue. SALINAS said she was in desperate need of a vehicle and had no money. SALINAS said she knew a female named Daniela Hernandez (HERNANDEZ) who had a boyfriend that lived in Mexico. SALINAS said that she knew that HERNANDEZ and her boyfriend were drug smugglers. SALINAS advised that HERNANDEZ's boyfriend went by the name "Güero". SALINAS said she approached HERNANDEZ and told her that she needed a vehicle and didn't have any money. HERNANDEZ told SALINAS that she needed to call "Güero". SALINAS said she called "Güero" and he said he would provide her a car with the understanding that at some point in the future she would have to smuggle drugs from Mexico into the United States. After SALINAS agreed, "Güero" instructed SALINAS to send him a picture of her Texas

Identification card so he could arrange to have the vehicle registered in her name. On June 09, 2017, "Güero" instructed her to come to Mexico and pick up the vehicle and it would not be loaded with any illegal narcotics. SALINAS said that "Güero" instructed her to cross the vehicle several times unloaded to establish a crossing history. SALINAS said that "Güero" said that eventually the drugs would be hidden in the vehicle and he would pay her \$500.00 U.S Dollars for crossing the drugs into the United States. SALINAS advised that it was her understanding that on this day she was crossing the vehicle for the first time and that it would not be loaded with any contraband.